Route 12
Frederick, Md. 21701
August 13, 1976

Law Clerk
Judge June Green
U. S. Courthouse
Washington, D.C. 20001

Dear Sir:

I am the plaintiff in C.A. 75-1996.

Before this can reach you my counsel, Mr. Jim Lesar, will be in Singapore, where he is to remain for four weeks. I am sending him a carbon of this letter and its enclosures.

Just before midday yesterday, when Mr. Lesar received the second set of papers in two days from AUSA Dugan, he phoned me to say he would try to see you and ask for an extension of time in which to respond that would protect me for two weeks after his return. I do not know whether he did get to speak to you.

At the time he called he had not been able to read these papers. I also had not. Since then I have. I believe two weeks will not be nearly enough time. This is explained further in my enclosed letters to AUSA Dugan.

I ask that you please give us until Friday, October 17.

It will be our intention to file a response or responses as soon as feasible and prior to October 17 if that is possible. I hope you can understand that, with what I regard as a long delay, I am anxious for this to proceed as expeditiously as possible. However, in addition to the amount of work and time required for response, I do know that Mr. Lesar has prior obligations in other cases, two for me alone, and that he is in individual practice.

There are other problems that mean time. We are separated by 60 miles. While it is not impossible for me to drive to Washington, medically it is inadvisable. By the time a severe thrombosis was diagnosed and I was hospitalized last year, the impairment of circulation in both legs was irreversible. I have lost the entire main vein in the left leg and thigh. The damage to that of the right is less but severe. This means that, if I keep my legs pendant for more than 20-30 minutes at a time, the blood puddles in the extremities. I therefore use public transportation, which enables me to walk around while traveling. It is to cope with this medical problem that I keep my legs on a large attache case in the courtroom and leave it intermittently before my case is called. It is not intended as any disrespect for the court, if this has been noticed.

Because the public transportation is poor and time-consuming, it means that in order to spend four to four-and-a-half hours with Mr. Lesar I have to start by 5:30 a.m. and a total of ten-and-a-half hours of time is required of me. We are, of course, interrupted frequently by his other obligations. This combination of factors means that if we are to confer adequately he has to drive here, which means about 120 miles of driving for him. These are exceptional circumstances but they are very real. They do become burdensome and inefficient for him and for me.

The circumstances of the present situation will require a great amount of extra time for both of us. For me, because I cannot confer with him and learn what he

wants of me with regard to either of the two more recent government filings, it means that as best a nonlawyer can I must prepare anything and everything Mr. Lesar may require. For him, it will require an extraordinary amount of reading of what I will prepare, after which he may ask more of me, which means more time for him. He will then have to prepare what I believe will be, no matter how severely he condenses what I will ready for him, an extensive response. I am confident this will include affidavits that will require the delays of conferring and then mail or travel.

With this an encapsulation of the realities that will face Mr. Lesar on his return, I do hope you can arrange the extension of time I request.

I am informing AUSA Dugan by carbon of this letter.

Sincerely,

Harold Weisberg